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7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA)	Case No. CR 06-0160 MMC
)	
12 v.)	STIPULATION IN SUPPORT OF
)	EXPEDITED SENTENCING
13)	PURSUANT TO L.R. 32-1(b)
)	
14 AKZO NOBEL CHEMICALS INTERNATIONAL)	
B.V.)	
)	
15 Defendant.)	DATE: May 17, 2006
)	TIME: 2:30 p.m.
16)	COURT: Hon. Maxine M. Chesney

17 On March 14, 2006, the United States filed an Information charging Akzo Nobel
18 Chemicals International B.V. ("Akzo Nobel") with participating in a conspiracy in the United
19 States and elsewhere to suppress and eliminate competition by fixing the price of hydrogen
20 peroxide beginning on or about July 1, 1998 and continuing until on or about December 1, 2001,
21 in violation of the Sherman Antitrust Act, 15 U.S.C. § 1. Akzo Nobel is scheduled for a change
22 of plea and possible sentencing before this Court on May 17, 2006. Akzo Nobel will waive
23 Indictment and plead guilty under Fed. R. Crim. P. 11(c)(1)(C). The United States and Akzo
24 Nobel have filed a Joint Sentencing Memorandum describing the material terms of the plea
25 agreement and the agreed upon sentencing recommendation.

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STIP. FOR EXPEDITED SENTENCING-AKZO

1 IT IS HEREBY STIPULATED AND AGREED as follows:

2 Akzo Nobel waives its right to a presentence report. The United States and Akzo Nobel
3 request that the Court sentence Akzo Nobel on an expedited basis pursuant to Crim. L.R. 32-1(b),
4 on May 17, 2006. The United States and Akzo Nobel respectfully submit that the Joint
5 Sentencing Memorandum and the Plea Agreement provide sufficient information for the Court to
6 impose sentence on May 17, 2006, the same date as the change of plea hearing, without a
7 presentence report.

8 DATED: May 3, 2006

Respectfully submitted,

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10 AKZO NOBEL CHEMICALS
11 INTERNATIONAL B.V.

U.S. DEPARTMENT OF JUSTICE

12 BY: _____/s/_____
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14 General Counsel
Akzo Nobel Group

15 COUNSEL FOR DEFENDANT

16 BY: _____/s/_____
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